

EXHIBIT 200

From: Bryan Tyson <btyson@taylorenghish.com>
Sent: Monday, September 26, 2022 9:13 AM
To: Cross, David D.; Bruce Brown; Vincent Russo; Russ Abney; Conaway, Jenna B.; 'Halsey G. Knapp, Jr.'; 'Adam M. Sparks'
Cc: Josh Belinfante; Carey Miller
Subject: RE: Secretary Raffensperger's Channel 11 Interview

External Email

David and Bruce:

Regarding Bruce's message about the Secretary's interview, we've reviewed the video. If you feel the need to raise this to the Court, you're free to do so. We do not see a need for further discovery from the Secretary or Mr. Germany.

Regarding David's message on the equipment, we've conveyed your message and the Secretary's office is proceeding with the replacement as we indicated in our filing on Friday. Your clients or representatives or your firms are welcome to attend.

I note that these messages were not sent to my law firm email address, making it more challenging to respond. Please make sure to send emails to my taylorenghish address and copy at least me, Josh, Vincent, and Carey from our team on any correspondence.

Thanks,

Bryan



Bryan P. Tyson

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From: bryan@tysonstrategies.com <bryan@tysonstrategies.com>
Sent: Monday, September 26, 2022 7:50 AM
To: Bryan Tyson <btyson@taylorenghish.com>
Subject: [POSSIBLE IMPERSONATION] - FW: Secretary Raffensperger's Channel 11 Interview

From: Cross, David D. <DCross@mofo.com>

Sent: Friday, September 23, 2022 7:21 PM

To: Bruce Brown <bbrown@brucebrownlaw.com>; Vincent Russo <vrusso@robbinsfirm.com>; Bryan Tyson <bryan@tysonstrategies.com>

Cc: Coalition for Good Governance <Marilyn@USCGG.org>; Russ Abney <rabney@wattsguerra.com>; Conaway, Jenna B. <JConaway@mofo.com>; 'Halsey G. Knapp, Jr.' <hknapp@khlawfirm.com>; 'Adam M. Sparks' <sparks@khlawfirm.com>

Subject: RE: Secretary Raffensperger's Channel 11 Interview

Vincent -

I just saw the state's filing tonight indicating it will replace some of the election equipment in Coffee County on Monday. We're happy to see that and commend your clients on that important step (although we of course believe the most reliable way to secure the election system is with HMPBs today).

We ask that you hold off on connecting any of the new equipment, devices, removable media, etc. to any of the electronic equipment in the office that's not being replaced, including the EMS server and the ICC, until after we have a chance to address this with the court on Monday. The equipment you're replacing has obviously been used with electronic equipment you are not replacing, notably the EMS server and the ICC. With all due respect your clients, it is not logical to treat some of the equipment as potentially compromised and therefore requiring replacement but not all of it.

Even though the EMS server and ICC were reportedly replaced summer of last year, that new equipment could've been infected by anything that was left behind on the other equipment you are now replacing. Given those two sets of equipment have been used together in the time since, it stands to reason that the EMS server and the ICC currently in place in Coffee County pose the same risk as the equipment your clients are now planning to replace. This is especially true given that some of those responsible for the breach have continued to have direct access to the new EMS server and ICC, as well as other electronic equipment in that office, since last summer, including for example Eric Cheney who only recently resigned from the board of elections.

We ask that you please convey our request to your clients to replace all the electronic equipment in the coffee county election office, not just some of it. Of course, our more fundamental request is that your clients switch to HMPBs to better secure elections and enhance voter confidence. But short of that, replacing all of the equipment is the absolute bare minimum in our view.

We're available to discuss this if helpful, including with our election security experts.

Best,
DC

From: Bruce Brown <bbrown@brucebrownlaw.com>

Date: Friday, Sep 23, 2022, 5:06 PM

To: Vincent Russo <vrusso@robbinsfirm.com>, Bryan Tyson <bryan@tysonstrategies.com>

Cc: Coalition for Good Governance <Marilyn@USCGG.org>, Cross, David D. <DCross@mofo.com>, Russ Abney <rabney@wattsguerra.com>, Conaway, Jenna B. <JConaway@mofo.com>

Subject: Secretary Raffensperger's Channel 11 Interview

External Email

Bryan and Vincent,

In the Secretary's interview with Doug Richards of Channel 11 that was aired last night (link below), the Secretary makes a number of statements that are completely and materially at odds with what the State Defendants have been representing to the public, to the Court, and to the plaintiffs in this litigation. The inconsistencies are too numerous to describe in this email, but include the statement by the Secretary that the SOS sent an investigator into Coffee County in May of 2021 and that, in between that visit and when the GBI was finally called in a year later, the SOS was "doing our work, investigating digging deep." The Secretary's statements contradict the State Defendants' repeated assertions that they first learned of the breach when they received the Hall telephone recording in February 2022 (see, e.g., Doc. 1444 at 2); no, according to the Secretary, the Secretary's investigators had already been busy since May of 2021 "doing our work, digging deeper." He then says that another reason the SOS did not act quicker was "people were not speaking truthfully to our investigators." But we know of no person who was contacted by the Secretary, the SEB, the GBI or the FBI prior to, at the earliest, August 2022.

In response to the question of why Gabe Sterling said in April of 2022 that nothing had happened in Coffee County, the Secretary said again that "people were not providing truthful testimony as part of that investigative process," referring, apparently, to grand jury testimony that had preceded Mr. Sterling's April 2022 statements. In response to Doug Richards' question as to why the SOS did not obtain the surveillance video when it opened the investigation in 2021, the Secretary gave the excuse that the plaintiffs had withheld production of the surveillance video, which you both know is all wrong (and nonsensical).

None of the information Secretary Raffensperger relayed to Doug Richards is disclosed in Ryan Germany's declaration. (Doc. 1441-1). According to Mr. Germany, the investigation into the Coffee County breach was not initiated until the SOS gained access to the Hall telephone recording. He swears that in "mid-March, 2022" he asked "our Investigation Division to open an investigation" into the alleged Coffee County breach, which consisted of a forensic evaluation of the server, stymied by the SOS' inability "to gain access to the server."

Plaintiffs are entitled to an immediate and full explanation for the inconsistencies between the Secretary's statements to the media and the State Defendants' representation to the Court and to the Plaintiffs. In addition, in light of the Secretary's statements, Plaintiffs will need to take his deposition and likely that of Ryan Germany, and will raise the issue with the Court during Monday's hearing.

Thanks,

Bruce

<https://www.11alive.com/article/news/politics/elections/raffensperger-coffee-county-probe/85-544756c2-8ead-4da9-926f-503f961d2e16>

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